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7 ANIBAL RODRIGUEZ, et al.,  
8 Plaintiffs,  
9 v.  
10 GOOGLE LLC,  
11 Defendant.

12 Case No. 20-cv-04688-RS  
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**CASE MANAGEMENT SCHEDULING  
ORDER**

15 Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, the parties attended a  
16 telephonic Initial Case Management Conference on October 15, 2020. After considering the Joint  
17 Case Management Statement, as well as a later-filed stipulation, submitted by the parties,  
18 consulting with the attorneys of record for the parties, and good cause appearing, IT IS HEREBY  
19 ORDERED THAT:

20       1. AMENDING THE PLEADINGS.

21 Plaintiffs may, without leave of the Court, file an amended complaint on or before  
22 November 11, 2020. After that date, any amendment of the pleadings shall be governed by Rule  
23 15 of the Federal Rules of Civil Procedure.

24       2. DISCOVERY.

25 On or before November 12, 2021, all non-expert discovery shall be completed by the  
26 parties. Discovery shall be limited as follows: (a) ten (10) non-expert depositions per party; (b)  
27 twenty-five (25) interrogatories per party, including all discrete subparts; (c) a reasonable number  
28 of requests for production of documents or for inspection per party; and (d) a reasonable number

of requests for admission per party.

### 3. DISCOVERY DISPUTES.

Discovery disputes will be referred to a Magistrate Judge. After the parties have met and conferred, the parties shall prepare a joint letter of not more than 5 pages explaining the dispute. Up to 12 pages of attachments may be added. The joint letter must be electronically filed under the Civil Events category of “Motions and Related Filings > Motions--General > Discovery Letter Brief.” The Magistrate Judge to whom the matter is assigned will advise the parties of how that Judge intends to proceed. The Magistrate Judge may issue a ruling, order more formal briefing, or set a telephone conference or a hearing. After a Magistrate Judge has been assigned, all further discovery matters shall be filed pursuant to that Judge’s procedures.

#### 4. EXPERT WITNESSES.

The disclosure and discovery of expert witnesses to be used in connection with any motion for class certification shall proceed as follows:

- a. On or before December 13, 2021, parties will designate experts in accordance with Federal Rule of Civil Procedure 26(a)(2).
  - b. On or before April 14, 2022, parties will designate their supplemental and rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).
  - c. On or before May 13, 2022, all discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed.

## 5. MOTION TO DISMISS

- a. Defendant will respond to plaintiffs' amended complaint, including by way of a motion to dismiss, on or before December 17, 2020.
  - b. Plaintiffs will file their opposition to any motion to dismiss by January 14, 2021.
  - c. Defendant will file its reply in support of any motion to dismiss by February 4, 2021.
  - d. A hearing for any motion to dismiss will be held on February 25, 2021, at 1:30 p.m. in Courtroom 3, 17th Floor, United States Courthouse, 450 Golden Gate

1 Avenue, San Francisco, California.

2 6. CLASS CERTIFICATION.

3 a. Plaintiffs' motion for class certification shall be heard on June 2, 2022, at 1:30 p.m.  
4 in Courtroom 3, 17th Floor, United States Courthouse, 450 Golden Gate Avenue,  
5 San Francisco, California.

6 7. CLASS ACTION SETTLEMENTS.

7 In putative class actions, prior to submitting any motion for approval of a class settlement,  
8 the parties shall review the guidelines at <http://cand.uscourts.gov/ClassActionSettlementGuidance>  
9 and tailor the motion appropriately.

10 8. FURTHER CASE MANAGEMENT CONFERENCE.

11 A Further Case Management Conference shall be held on **November 18, 2021, at 10:00**  
12 **a.m.** in Courtroom 3, 17th Floor, United States Courthouse, 450 Golden Gate Avenue, San  
13 Francisco, California. The parties shall file a Joint Case Management Statement at least one week  
14 prior to the Conference.

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16 **IT IS SO ORDERED.**

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18 Dated: October 23, 2020

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RICHARD SEEBORG  
United States District Judge